

IN THE COURT OF COMMON PLEAS OF LAWRENCE COUNTY, PENNSYLVANIA

ANNE PAPA,

Plaintiff,

v.

NESHANNOCK VFD, NESHANNOCK VFD
BOARD, JOHN D. DICOLA, CHIEF AND
INDIVIDUALLY, BRADLEY SHAFFER,
DEPUTY AND INDIVIDUALLY, AND
BRIAN MELCER, DEPUTY AND
INDIVIDUALLY,

Defendants.

CIVIL DIVISION

10701 of 2020ca ✓^{SD}

PRAECIPE FOR APPEARANCE

Filed on Behalf of Defendants,
*Neshannock VFD, Neshannock VFD Board,
John D. Dicola, Chief and individually,
Bradley Shaffer, Deputy and individually, and
Brian Melcer, Deputy and individually.*

Counsel of Record for This Party:

Bruce E. Rende, Esquire
PA I.D.#52714

Timothy D. Iannini, Esquire
PA I.D. #205572

ROBB LEONARD MULVIHILL LLP
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JURY TRIAL DEMANDED

FILED/ORIGINAL

2020 OCT 30 AM 10:16

JODI KLABON-ESOLDO

IN THE COURT OF COMMON PLEAS OF LAWRENCE COUNTY, PENNSYLVANIA

ANNE PAPA,

Plaintiff,

v.

NESHANNOCK VFD, NESHANNOCK VFD
BOARD, JOHN D. DICOLA, CHIEF AND
INDIVIDUALLY, BRADLEY SHAFFER,
DEPUTY AND INDIVIDUALLY, AND
BRIAN MELCER, DEPUTY AND
INDIVIDUALLY,

Defendants.

CIVIL DIVISION

10701 of 2020ca

PRAECIPE FOR APPEARANCE

Please enter the appearance of ROBB LEONARD MULVIHILL LLP, Bruce E. Rende, Esquire, and Timothy D. Iannini, Esquire, on behalf of Defendants, *Neshannock VFD, Neshannock VFD Board, John D. Dicola, Chief and individually, Bradley Shaffer, Deputy and individually, and Brian Melcer, Deputy and individually*, in the above-captioned case.

Respectfully submitted,

ROBB LEONARD MULVIHILL LLP

/s/Bruce E. Rende

Bruce E. Rende, Esquire

FILED/ORIGINAL

{R1102382.1 }

2020 OCT 30 AM 10:16

JODI KLABON-ESOLDO
REC AND CLERK

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of its **PRAECIPE FOR APPEARANCE** has been served via United States First Class Mail, postage prepaid, this 28th day of October, 2020, upon the following:

Angelo A. Papa, Esquire
Signature Hill Legal
318 Highland Avenue
New Castle PA 16101

/s/Bruce E. Rende
Bruce E. Rende, Esquire

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Counsel for Defendant

Signature: /s/Bruce E. Rende

Name: Bruce E. Rende, Esquire

Attorney No.: 52714

FILED/ORIGINAL

2020 OCT 30 AM 10:16

JODI KLABON-ESOLDO
DPO AND CLERK

ROBB LEONARD MULVIHILL

ATTORNEYS AT LAW

October 28, 2020

Bruce E. Rende
brende@rlmlawfirm.com
Also admitted in WV & OH

Jodi Klabon-Esoldo
Lawrence County Government Center
Prothonotary Office
430 Court Street
New Castle, PA 16101

RE: Anne Papa v. Neshannock VFD, Neshannock VFD Board, John D. Dicola,
Chief and individually, Bradley Shaffer, Deputy and individually, and Brian
Melcer, Deputy and individually,
Claim No: PATR20100579-00001
Our File No: 26674BER

Dear Ms. Klabon-Esoldo:

Enclosed please find the Defendants' Praecipe for Appearance for filing in the above-referenced matter.

If you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,

/s/Bruce E. Rende
Bruce E. Rende

BER/evm
Enclosures

cc: Angelo A. Papa, Esquire (w/o enclosures)

RECEIVED
OCT 30 2020
PRO & CLERK

{R1102550.1 }